

**SEALED**

**LEAD**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

2017 JUN 21 PM 12:30

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

ALAA MOHAMMED ALLAWI (1)  
BENJAMIN ITA UNO (2)  
ERIC LAMAR GOSS (3)  
TREVOR ALAN ROBINSON (4)  
FERNANDO PADILLA BECERRA  
aka KALIFA (5)  
MOHAMED M AL SALIHI aka Blake (6)  
CALEB APPIAH-OSEI (7)  
JASON RAY SAUCEDO (8)

**Defendants.**

CRIMINAL NO. 1

DEPUTY CLERK

SA 17 CR 0505 <sup>DEPUTY CLERK</sup> INDICTMENT DAE

§ **Ct 1:** 21 U.S.C. §§ 841(a)(1)/(b)(1)(A)  
§ and 846 Conspiracy to Distribute Fentanyl,  
§ Methamphetamine, and Cocaine;  
§ **Ct 2:** 18 U.S.C. §924(c) Possession of a  
§ Firearm During a Drug Trafficking Crime;  
§ **Ct 3:** 21 U.S.C. §§ 841(a)(1)/(b)(1)(C)  
§ Possession with Intent to Distribute Cocaine  
§ **Ct 4:** 21 U.S.C. §§ 841(a)(1)/(b)(1)(B)  
§ Possession with Intent to Distribute  
§ Methamphetamine.  
§ **Ct 5:** 18 U.S.C. §924(c) Possession of a  
§ Firearm During a Drug Trafficking Crime.

## THE GRAND JURY CHARGES:

**COUNT ONE**

[21 U.S.C. §§ 841(a)(1)/(b)(1)(A), (b)(1)(B), and 841(b)(1)(C) and 846]

From on or about December 2015 and continuing through and including the date of this indictment, within the Western District of Texas, the Southern District of Texas, the Northern District of Texas, the Central District of California, and elsewhere, Defendants,

**ALAA MOHAMMED ALLAWI (1)**  
**BENJAMIN ITA UNO (2)**  
**ERIC LAMAR GOSS (3)**  
**TREVOR ALAN ROBINSON (4)**  
**FERNANDO PADILLA BECERRA**  
**aka KALIFA (5), and**  
**MOHAMED M Al SALIHI aka Blake (6)**

unlawfully, knowingly, and intentionally combined, conspired, confederated and agreed together and with others to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of Fentanyl, a Schedule II Controlled Substance, 500 grams or

more of a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, and 500 grams or more of a mixture or substance containing a detectable amount of Cocaine, a Schedule II Controlled Substance, contrary to Title 21, United States Code, Sections 841(a)(1)/(b)(1)(A), (b)(1)(B), and 841(b)(1)(C), and in violation of Title 21, United States Code, Section 846.

**COUNT TWO**  
**[18 U.S.C. § 924(c)]**

That on or about May 17, 2017, in the Western District of Texas, Defendant,

**ALAA MOHAMMED ALLAWI (1),**

did knowingly use and carry at least one firearm, to wit: a Ruger, model LCR, .38 caliber revolver, serial number 541-78935; a Sig Sauer, model P229, .40 caliber pistol, serial number AM19675; a Glock, model 27, .40 caliber pistol, serial number FXX968; and a New Frontier Armory, model LW-15, .223 caliber rifle, serial number NLV58177, during and in relation to, and did possess said firearm in furtherance of, a drug trafficking crime that may be prosecuted in a court of the United States, that is Conspiracy to Possession with Intent to Distribute , Fentanyl, Methamphetamine, and Cocaine, in violation of 21 United States Code §846, as further described in Count One, in violation of Title 18, United States Code, Section 924(c).

**COUNT THREE**  
**[21 U.S.C. § 841(a)(1)/(b)(1)(C)]**

That on or about December 7, 2016, in the Western District of Texas and the Northern District of Texas, Defendant,

**CALEB APPIAH-OSEI (7),**

did unlawfully, knowingly, and intentionally possess with intent to distribute a controlled substance, which offense involved less than 500 grams of a mixture or substance containing a

detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1)/(b)(1)(C).

**COUNT FOUR**  
**[21 U.S.C. §§ 841(a)(1)/(b)(1)(B)]**

That on or about December 2, 2015, in the Western District of Texas, Defendant,

**JASON RAY SAUCEDO (8),**

did unlawfully, knowingly, and intentionally possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1)/(b)(1)(B).

**COUNT FIVE**  
**[18 U.S.C. § 924(c)]**

That on or about December 2, 2015, in the Western District of Texas, Defendant,

**JASON RAY SAUCEDO (8),**

did knowingly use and carry at least one firearm, to wit: a Ruger, model P91DC, .40 caliber pistol, serial number 340-01808; an H and R, model 1871, 12 gauge shotgun, serial number NZ726974; a Walther, model P22, .22 caliber pistol, serial number WA047419; and a Smith and Wesson, model SD40VE, .40 caliber pistol, serial number HEC9255, during and in relation to, and did possess said firearm in furtherance of, a drug trafficking crime that may be prosecuted in a court of the United States, that is Possession with Intent to Distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of 21 United States Code §§841(a)(1)/(b)(1)(B), as further described in Count Four, in violation of Title 18, United States Code, Section 924(c).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
**[See Fed.R.Crim.P. Rule 32.2]**

**I.**

**Drug Violations and Forfeiture Statutes**

**[Title 21 USC §§ 846, 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C),  
subject to forfeiture pursuant to Title 21 USC §§ 853(a)(1) and (2)]**

As a result of the foregoing criminal violations set forth in Counts One, Three, and Four above, the United States of America gives notice to Defendants of its intent to seek the forfeiture of the properties described below upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. § 853(a)(1) and (2), which states:

**Title 21 U.S.C. § 853. Criminal forfeitures**

**(a) Property subject to criminal forfeitures.**

Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law.--

- (1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;
- (2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; . . .

**II.**

**Firearms Violations and Forfeiture Statutes**

**[Title 18 USC § 924(c), subject to forfeiture pursuant to Title 18 USC § 924(d)(1),  
made applicable to criminal forfeiture by Title 28 USC § 2461]**

As a result of the foregoing criminal violations set forth in Counts Two and Five, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the below described properties upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

**Title 18 USC § 924. Penalties**

**(d)(1)** Any firearm or ammunition involved in or used in any knowing violation of . . . section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter . . . .

This Notice of Demand for Forfeiture includes, but is not limited to the following properties described below in Paragraph III-IV.

**III.**  
**Real Property**

Real Property located and situated at **13126 Regency Bend, San Antonio, Bexar County, Texas**, with all buildings, appurtenances, and improvements thereon and any and all surface and sub-surface rights, title, and interests, if any, and being more fully described as follows:

LOT 25, BLOCK 3, NEW CITY BLOCK 18922, REGENCY MEADOW SUBDIVISION, UNIT 2, IN THE CITY OF SAN ANTONIO, BEXAR COUNTY, TEXAS, ACCORDING TO THE MAP OR PLAT OF RECORD IN VOLUME 9529, PAGES 225-226, DEAD AND PLAT RECORDS OF BEXAR COUNTY, TEXAS.

**IV.**  
**Firearms**

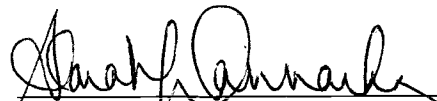
1. Ruger, model LCR, .38 caliber revolver, serial number 541-78935;
2. Sig Sauer, model P229, .40 caliber pistol, serial number AM19675;
3. Glock, model 27, .40 caliber pistol, serial number FXX968;
4. New Frontier Armory, model LW-15, .223 caliber rifle, serial number NLV58177;
5. Walther, model PK380, .380 caliber pistol, serial number WB011386;
6. Ruger, model P91DC, .40 caliber pistol, serial number 340-01808;
7. H and R, model 1871, 12 gauge shotgun, serial number NZ726974;
8. Walther, model P22, .22 caliber pistol, serial number WA047419;
9. Smith and Wesson, model SD40VE, .40 caliber pistol, serial number HEC9255; and
10. Any related ammunition and firearm accessories.

A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

RICHARD L. DURBIN, JR.  
UNITED STATES ATTORNEY

BY:

  
SARAH WANNARKA  
Assistant United States Attorney